

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

Dale R. Ludwick, on behalf of Herself and)
All Others Similarly Situated)
)
)
Plaintiff,)
)
)
v.) Case No. 15-00011-CV-W-DGK
)
)
Harbinger Group, Inc., Fidelity & Guaranty)
Life Insurance Company, Raven)
Reinsurance Company, and Front Street Re)
(Cayman) Ltd.,)
)
)
Defendants.)

MOTION FOR LEAVE TO WITHDRAW

Pursuant to Local Rule 83.05(o), the undersigned counsel, Frank A. Taylor and Julie H. Firestone of Briggs and Morgan, P.A. move the Court for an Order granting them leave to withdraw from representation of Defendants Harbinger Group, Inc. and Front Street Re (Cayman) Ltd. In support of this Motion for Leave to Withdraw, they state:

1. The undersigned counsel have, until now, represented all Defendants in this action.
2. On August 11, 2015, attorneys S. Gale Dick, Julie A. Keersmaekers, and Mark Spatz of Cohen & Gresser, LLP were admitted to appear *pro hac vice* by this Court for Defendants Harbinger Group, Inc. and Front Street Re (Cayman) Ltd.
3. Consistent with Local Rule 83.05(o), substitute counsel have entered their appearances for Defendants Harbinger Group, Inc. and Front Street Re (Cayman) Ltd.

WHEREFORE, the undersigned counsel, Frank A. Taylor and Julie H. Firestone of Briggs and Morgan, P.A. move this Court for an Order granting them leave to withdraw from the representation of Defendants Harbinger Group, Inc. and Front Street Re (Cayman) Ltd.

Dated: September 10, 2015

Respectfully submitted,

BRIGGS AND MORGAN, P.A.

By: /s/ Frank A. Taylor
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-and-

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By: /s/ J. Michael Vaughan
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*Attorneys for Defendants Fidelity &
Guaranty Life Insurance Company,
Harbinger Group, Inc., Raven Reinsurance
Company, and Front Street Re (Cayman)
Ltd.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 10th day of September 2015, I electronically filed the above and foregoing document with the Clerk of Court of the Western District of Missouri using the Court's ECF system, which will send notification of said filing to all counsel of record who are ECF participants.

/s/ *J. Michael Vaughan*